



60 PARK PLACE, SUITE 1100, NEWARK, NJ 07102 973-424-9777 WWW.KROVATIN.COM

GERALD KROVATIN
HENRY E. KLINGEMAN**
HELEN A. NAU*
ERNESTO CERIMELE*

ALSO ADMITTED IN HI AND PA**
ALSO ADMITTED IN NY*

February 6, 2014

Honorable Esther Salas, U.S.D.J.
U.S. District Court, District of New Jersey
Martin Luther King, Jr. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: United States v. Giuseppe Giudice a/k/a "Joe Giudice" and Teresa Giudice
Crim. No. 13-495 (ES)

Dear Judge Salas:

We represent Defendant Teresa Giudice. The defendants, Ms. Giudice and her husband Giuseppe Giudice, have each filed motions for trials separate from each other and for separate trials on the so-called loan fraud and bankruptcy fraud allegations, respectively. As of now, the motion hearing is set for April 9 and the joint trial on all charges is set for April 14. In view of the motions' potential impact on the trial schedule, we respectfully ask the Court to consider moving up the hearing on pretrial motions to the earliest time convenient for the Court to hear the motions and render a decision.

Thank you for your thoughtful consideration.

Respectfully submitted,

/s/ Henry E. Klingeman
HENRY E. KLINGEMAN

cc: Jonathan Romankow, AUSA (via e-mail)
Rachael Honig, AUSA (via e-mail)
Miles Feinstein, Esq. (via e-mail)
John Vincent Saykanic, Esq. (via e-mail)